

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____x
In re:

DELPHI CORP., et al.

Debtors.

Chapter 11

Case No. 05-44481 (RDD)
(Jointly Administered)

_____x
**JOINT RESPONSE OF LAURA J. MARION (CLAIM NO. 12219) AND PAMELA GELLER
(CLAIM NO. 12147) TO DEBTOR'S TWENTY-FIRST OMNIBUS OBJECTION
(Docket No. 9535)**

Claimants Laura J. Marion and Pamela Geller respond to the Debtor's twenty-first omnibus objection to claims as follows:

1. On July 28, 2006, Marion filed proof of claim number 12219 against Delphi, which asserts an unsecured non-priority claim in an unliquidated amount (the "Marion Claim") for indemnification and advancement of expenses.

2. On July 28, 2006, Geller filed proof of claim number 12147 against Delphi, which asserts an unsecured non-priority claim in an unliquidated amount (the "Geller Claim") for indemnification and advancement of expenses.

3. On December 22, 2006, this Court issued its Order Under 11 U.S.C. Section 105(a) and Fed. R. Bankr. P. 2016(a) Authorizing Advancement of Defense Costs Under Debtors' Insurance Policies (Docket No. 6264) ("Insurance Proceeds Defense Costs Order"), which related to the Marion Claim and Geller Claim, amongst others.

4. Marion acknowledges and agrees that the Marion Claim should be disallowed and expunged.

5. Geller acknowledges and agrees that the Geller Claim should be disallowed and expunged.

6. However, Marion and Geller request that the Debtors acknowledge and agree that nothing in the order disallowing their claims impacts the rights or claims of Marion and Geller under Insurance Proceeds Defense Costs Order.

WHEREFORE, Marion and Geller request that the entry of any order disallowing their respective claims provide that Marion's and Geller's rights or claims under the Insurance Proceeds Defense Costs Order are not impacted.

Respectfully Submitted,

JAFFE RAITT HEUER & WEISS, P.C.

Dated: October 24, 2007

By: /s/ Christopher A. Andreoff
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